

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11745RWZ

BARBARA DEIGHTON HAUPT, Trustee of
BD REALTY TRUST,

Plaintiff

v.

TOWN OF WAREHAM acting by and
through the BOARD OF SELECTMEN OF
THE TOWN OF WAREHAM, and the
BOARD OF SELECTMEN OF THE TOWN
OF WAREHAM,

Defendant

JOINT MOTION TO EXTEND
DISCOVERY DEADLINES

Now come the parties in the above captioned matter and hereby request that this Honorable Court extend the discovery deadlines as follows:

1. Request for Admissions served by July 21, 2006;
2. Responses to Requests for Admissions served by August 21, 2006; and
3. All depositions, expert and fact witnesses, completed by September 29, 2006.

For reasons therefore, the parties state that due to the complexity of this matter and the significant number of expert witnesses, additional time is needed to review the expert reports filed and draft Requests for Admissions. Accordingly, an additional two weeks is requested for the service of Requests for Admissions. As a result, the current 30 day period for answering the Admissions would necessarily be extended by two weeks.

Furthermore, since answers to the Admissions are critical in preparing for expert depositions, the extension of approximately six weeks after the service of answers to Admissions allows counsel to prepare for and conduct the expert depositions.

BARBARA DEIGHTON HAUPT,
and Trustee of BD REALTY TRUST
By its attorney,

/s/ Jeffrey T. Anglely (by JTB)

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TOWN OF WAREHAM, acting by
through the Board of Selectmen of the
Town of Wareham and the BOARD OF
SELECTMEN OF THE TOWN OF
WAREHAM,
By their attorney,

/s/ Jeffrey T. Blake

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